

July 29, 2021

Dear CalHR,

We submit this letter to you today on behalf of the rank-and-file Toxicologists of the Department of Toxic Substances Control (DTSC). DTSC currently employs 19 Staff Toxicologists (Specialist) and 2 Associate Toxicologists. Together we have a total of 32 advanced degrees including 7 Masters of Science, 3 Masters of Public Health, 1 Masters of Preventative Veterinary Medicine, and 21 Doctoral Degrees (21 PhD and 1 Doctor of Veterinary Medicine). We are a group of highly trained scientists who play a critical role in DTSC's mission to protect California's people, communities, and environment from harmful effects of toxic substances. We are passionate and dedicated civil servants and are vastly underpaid compared to other State classes and toxicologists in other sectors. We are writing to implore you to restore pay equity and compensate scientists commensurate with the valuable services we provide to the people of California.

Toxicologists at DTSC focus on protecting human health and the environment. We evaluate potential health and environmental risks at residential, school, commercial, industrial, military, and open space properties contaminated with toxic and carcinogenic chemicals. Through our evaluations and advocacy for site remediation and safer consumer products we help protect the people and sensitive ecological habitats of California. DTSC Toxicologists are dedicated to ensuring the protection of all communities. DTSC's Schools Program evaluates all new schools and school renovations that will use State funds. We help ensure that our California schools are safe for students and school staff from hazardous chemicals. Much of our work evaluates commercial properties such as strip malls that are dealing with legacy contamination from former dry cleaners and the solvents that were disposed of down drains or in the soils as a standard practice. Toxicologists advocate for testing in nearby businesses and homes and are often involved in community outreach to help inform and educate about potential exposures and health risks.

Many of these sites are near Environmental Justice Communities who are disproportionately exposed to hazardous chemicals in consumer products and the environment. Work in these communities is so critical the Governor recently signed the 2021-2022 budget which included legislation (SB 158) that focuses on protecting the health of Vulnerable Communities. To achieve the goals of the Initiative, DTSC has already announced that it plans to create at least three new Toxicologist positions just for this initiative. Given that the Safer Consumer Products program is greatly expanding its work, and the DTSC 2021-2022 budget for cleanups has been more than doubled, it is likely that several additional Toxicologists will also be needed to address the increased work load. However, historically, recruitment of experienced Toxicologists to the State has been incredibly challenging; particularly at the Staff Toxicologist (Specialist) level. This classification requires a PhD in toxicology or a closely related field and a minimum of three years of post-doctoral experience. At our current salaries,

California is not competitive to recruit these highly trained, experienced Toxicologists needed for the SB158 Initiative, much less the additional ones needed to handle the other increases in work load at DTSC.

A recent survey by the Society of Toxicology and the American College of Toxicologists of 1,021 doctoral-level toxicologists within the United States demonstrated a huge pay gap for California Toxicologists. The average base salary of US doctoral toxicologists is \$162,546 while the base salary for a State of California doctoral Toxicologist is \$87,589, representing an 86% difference. Our federal counterparts at the US Environmental Protection Agency have maximum salaries that are currently 20-34% greater than those of Staff Toxicologists depending on where they live in the State of California (the federal government provides locality pay).

This significant salary gap makes recruitment incredibly challenging. For example, a recent listing for a Staff Toxicologist in DTSCs Ecological Risk Assessment Section was posted repeatedly from May 2019 to April 2020 in multiple regional offices and not one applicant met the minimum qualifications. Only when the position was reclassified to Associate Toxicologist was the position filled in November 2020. Furthermore, a recent survey of current DTSC Toxicologists (all classifications), identified approximately 40% are age 60 or above. The State of California needs to be competitive to replace these valuable scientists upon their retirement.

The Society of Toxicology salary survey clearly shows State of California Toxicologists are paid far less than their peers in academia, federal government, and especially peers in industry and consulting. State of California Toxicologists are regulators who sit across the table from much higher paid Consulting and Industry Toxicologists who represent responsible parties and consumer product manufacturers. Salaries for Toxicologists in the State of California need to be competitive with salaries in other sectors or the most talented toxicologists will go to these sectors.

Significant pay inequity also exists within the State of California. Toxicologists at DTSC serve as technical support staff on a variety of projects. Two other technical support branches at DTSC consist of engineers, typically Hazardous Substance Engineers (HSE), and geologists, typically hired as Engineering Geologists (EG). Toxicologists contribute and collaborate on the same teams and carry similar workloads, but we generally have much lower salaries. This is in direct contrast to the required education and experience for these different positions. To become a Staff Toxicologist, the minimum qualifications are a PhD in Toxicology or closely related field (for which a bachelor's degree is a prerequisite, in addition to a minimum of 4 years of graduate study) plus an additional 3 years of post-doctoral work experience. The minimum qualifications for Associate Toxicologist are a master's degree plus additional three years of experience or a PhD. This is in comparison to both the HSE and the EG classifications, both of which only require a bachelor's degree up to Range C of those classes. Range D and the Senior (Sr.) HSE and Sr. EG positions do require

professional engineer or geologist certifications which require a few years of prior work experience.

Salary inequities among these State classifications did not always exist. In 2000, Staff Toxicologists made approximately 30% more than the HSE Range C but now our salaries are nearly equivalent. The Sr. HSE classification used to make about 10% less than Staff Toxicologists in 2000 and now they make nearly 20% more. The disparity for Associate Toxicologists is even greater. Compared with the Sr. EG, the salary difference grew from 8.5% to 48%. Unlike the HSE and EG classifications, there is no senior technical (non-supervisory) class for Toxicologists. This limits our upward mobility. Furthermore, several DTSC Toxicologists have been at the top step of our classification for more than 20 years and have never received longevity pay provided to HSE and EG.

Toxicologists answer the ultimate question of “is it safe” for the people of California to drink their water and breath the air in their homes and workplaces, for children to attend school and play outside in their yards, and to trust that the products they purchase and bring home to their families are safe. Toxicologists work just as hard as our counterparts on the same projects, reviewing the same documents, using expertise that requires significantly more training and education, but we are not paid comparably. This is incredibly demoralizing for Toxicologists who are essential to and make significant contributions to these teams.

Pay inequity also exists within the Toxicologists series. Prior to 2018, the salary difference between the Staff Toxicologist and Senior Toxicologist classifications was approximately 6%. Following the California Equal Pay Act, the supervisors were given a significant raise that resulted in Senior Toxicologists earning 35% more than the Staff Toxicologists that they supervise. The historical differential between supervisors and their staff must be restored.

Morale is low for the rank-and-file Toxicologists. The work we do is critical for the State of California. We are dedicated and passionate scientists and want to feel respected and fairly compensated for the important work we do protecting Californians and our environment. Fair and equitable pay needs to be restored. DTSC will not be able to achieve its mission if we cannot hire and retain Toxicologists. Appropriate compensation is needed, and it is needed now. We implore you to do the right thing.

Sincerely,

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